

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

THAN ORN, an individual,

Plaintiff,

NO.

CITY OF TACOMA, a municipal corporation, and KRISTOPHER CLARK, in his individual capacity,

## Defendants.

Superior Court of the State of  
Washington County of Pierce  
No. 13-2-13886-2)

**NOTICE OF REMOVAL OF ACTION  
FROM STATE COURT**

TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

PLEASE TAKE NOTICE THAT, pursuant to 28 U.S.C. § 1441(a), defendant hereby removes this action from the Superior Court of the State of Washington, County of Pierce, to the United States District Court for the Western District of Washington at Tacoma. Defendants appear solely for the purpose of removal and for no other purpose, reserving all other defenses available to defendant and alleges on information and belief as follows:

**NOTICE OF REMOVAL OF ACTION  
FROM STATE COURT - Page 1 of 3**

Tacoma City Attorney  
Civil Division  
747 Market Street, Room 1120  
Tacoma, Washington 98402-3767  
(253) 591-5885 / FAX 591-5755

1. Plaintiff filed the above-captioned action against Defendants City  
2 of Tacoma and Kristopher Clark in the Superior Court of the State of  
3 Washington, County of Pierce, on October 10, 2013. The defendants were  
4 served with a copy of the Summons and Complaint on October 16, 2013, a  
5 copy of which is attached hereto as Exhibit A.

6. This Notice of Removal is being filed within 30 days after the  
7 matter was filed in the Superior Court and served on the defendants, and thus  
8 is timely filed pursuant to 28 U.S.C. § 1446(b).

9. This is a civil action for which the United States District Court has  
10 original jurisdiction pursuant to 28 U.S.C. §1331, as plaintiff, Than Orn, has  
11 asserted a violation of his civil rights as secured by federal law.

13. Plaintiff has also asserted state tort actions. Defendants request  
14 that all claims be removed from the Superior Court of the State of Washington,  
15 County of Pierce, and that this Court exercise supplemental jurisdiction over  
16 these claims pursuant to 28 U.S.C. § 1367(a) and 28 U.S.C. §1441(c).

17. Pursuant to 28 U.S.C. § 1446(a), copies of all process, pleadings,  
18 and orders served upon defendant to date are attached.

19. The defendants will promptly file a copy of this Notice in the  
20 Superior Court of the State of Washington, County of Pierce, and will serve a  
21 copy of the same on the plaintiff in accordance with 28 U.S.C. § 1446(d).  
22

23 /  
24  
25  
26

1 WHEREFORE, the defendants give notice that the above-captioned  
2 action commenced against it in the Superior Court of the State of Washington,  
3 County of Pierce, has been removed to this Court.

4 DATED this 8th day of November, 2013.

5 ELIZABETH A. PAULI, City Attorney

6 By:



7  
8 JEAN P. HOMAN  
9 WSBA# 27084  
10 Deputy City Attorney  
11 Attorney for Defs. City of Tacoma  
12 and Kristopher Clark

13 **CERTIFICATE OF SERVICE**

14 I hereby certify that on 11-8-13, I electronically  
15 filed, through my staff, the foregoing with the Clerk of the Court using the  
16 CM/ECF system which will send notification of such filing to the attorneys of  
17 record on file.

18   
19 JEAN P. HOMAN  
20 WSBA#27084  
21 Attorney for Def. City of Tacoma  
22 Tacoma City Attorney's Office  
23 747 Market Street, Suite 1120  
24 Tacoma, WA 98402  
25 (253) 591-5885  
26 Fax: (253) 591-5755  
jhomana@ci.tacoma.wa.us

**RECEIVED**

OCT 16 2013

TACOMA CITY ATTORNEY  
CIVIL DIVISION

VIA Delivery  
2nd & Clallam  
Service of Civil Process  
by Cheryl Corcoran  
City of Tacoma

E-FILED  
IN COUNTY CLERK'S OFFICE  
PIERCE COUNTY, WASHINGTON

October 10 2013 10:57 AM

KEVIN STOCK  
COUNTY CLERK  
NO: 13-2-13886-2

SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR PIERCE COUNTY

10 THAN ORN, individually,

11 Plaintiff,

12 vs.

13 CITY OF TACOMA, a municipal  
corporation, and; KRISTOPHER CLARK, in  
his individual capacity,

14 Defendants.

15 NO.

16 SUMMONS

17 TO ALL NAMED DEFENDANTS:

18 A lawsuit has been started against you in the above entitled court by Plaintiff.  
19 Plaintiff's claims are stated in the written Complaint, a copy of which is served upon you with  
20 this Summons.

21 In order to defend against this lawsuit, you must respond to the Complaint by stating  
22 your defense in writing, and serve a copy upon the person signing this Summons within  
23 20 days after the service of this Summons, excluding the day of service, or a default judgment  
24 may be entered against you without notice. A default judgment is one where a Plaintiff is  
25 entitled to what he asks for because you have not responded. If you serve a notice of



SUMMONS 1 of 2

911 Pacific Avenue, Suite 200  
Tacoma, WA 98402  
Phone: (253) 777-0799 Facsimile: (253) 627-0654  
www.pcvalaw.com

1 appearance on the undersigned person, you are entitled to notice before a default judgment  
2 may be entered.

3 Any response or notice of appearance which you serve on any party to this lawsuit  
4 must also be filed by you with the court within 20 days after the service of Summons,  
5 excluding the day of service.

6  
7 If you wish to seek the advice of an attorney in this matter, you should do so promptly  
8 so that your written response, if any, may be served on time.  
9

10 This Summons is issued pursuant to Rule 4 of Civil Rules for Courts of Limited  
11 Jurisdiction.

12 Dated this 10<sup>th</sup> day of October, 2013.  
13

14 PFAU COCHRAN VERTETIS AMALA, PLLC

15  
16 By   
17 Darrell L. Cochran, WSBA No. 22851  
18 [Darrell@pcvalaw.com](mailto:Darrell@pcvalaw.com)  
19 Loren A. Cochran, WSBA No. 32773  
20 [loren@pcvalaw.com](mailto:loren@pcvalaw.com)  
21 Attorneys for Plaintiff

22  
23 LAW OFFICE OF THOMAS A. BALERUD

24 By: /s/ Thomas A. Balerud

25 Thomas A. Balerud, WSBA No. 19539  
26 Attorney for Plaintiff

  
A Professional Limited Liability Company

E-FILED  
IN COUNTY CLERK'S OFFICE  
PIERCE COUNTY, WASHINGTON

October 10 2013 10:57 AM

KEVIN STOCK  
COUNTY CLERK  
NO: 13-2-13886-2

**RECEIVED**  
via  
12:40  
OCT 16 2013 service accepted by  
TACOMA CITY ATTORNEY  
CIVIL DIVISION  
Cheryl Curner  
Pfau Cochran Vertetis Amala  
only

SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR PIERCE COUNTY

8 THAN ORN, individually,

9 Plaintiff,

10 vs.

11 CITY OF TACOMA, a municipal  
12 corporation, and; KRISTOPHER CLARK, in  
his individual capacity,

13 Defendants.

NO.

COMPLAINT FOR DAMAGES  
JURY DEMANDED

14 COMES NOW Plaintiff Than Orn, by and through his attorneys, Darrell Cochran,  
15 Loren Cochran and Pfau Cochran Vertetis Amala PLLC, and Thomas Balerud and The Law  
16 Office of Thomas A. Balerud and hereby alleges as follows:

17 I. INTRODUCTION

18 1.1 Thirty-four year old Than Orn was unlawfully shot multiple times in the back,  
19 the back shoulder and the back of his neck by Tacoma police officer Kristopher Clark for  
20 failing to obey police instructions.

21 1.2 As a result of his injuries, Plaintiff Orn is paralyzed below the waist and  
22 requires continuing medical and respite care. Orn has also lost his ability to work in his  
23 chosen profession and has experienced severe mental and emotional injuries including the  
24 collapse of his marriage as a result of Kristopher Clark's excessive and unlawful use of force.

**PCV** PEAU COCHRAN  
VERETETIS AMALA  
A Professional Limited Liability Company

25 COMPLAINT FOR DAMAGES 1 of 9

26 911 Pacific Avenue, Suite 200  
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1           1.3   The City of Tacoma conducted a Pursuit Review of the police response  
 2 involving Than Orn and concluded that all officers needed; 1) Additional Pursuit  
 3 Immobilization Technique (PIT) Training; 2) Improved radio communications relaying  
 4 relevant information; 3) To review of the number of responding vehicles, and; 4) Improved  
 5 command and on-scene supervisory directions. In addition, the City of Tacoma conducted a  
 6 Use of Deadly Force review and concluded that Officer Clark needed additional training in  
 7 environmental awareness, tactical positioning and officer safety. The systemic failures of the  
 8 Tacoma Police Department, including but not limited to those areas addressed above, resulted  
 9 in an unnecessary and unlawfully excessive use of force which has left Than Orn permanently  
 10 disabled, in constant physical pain and mentally and emotionally devastated. The City of  
 11 Tacoma and its police department were deliberately indifferent to the constitutional rights of  
 12 Than Orn by failing to adequately train its officers, and/or are believed to have express  
 13 policies, and/or are believed to have widespread practices which encouraged and enabled the  
 14 use deadly force in an unconstitutional manner that jeopardizes the safety of all citizens.

## 17           II.    PARTIES

18           2.1   Plaintiff Than Orn was a resident of Pierce County, Washington at all times  
 19 relevant to this action.

20           2.2   Defendant City of Tacoma is a Washington municipal entity with police  
 21 powers existing pursuant to the Washington State Constitution and the Constitution of the  
 22 United States. Defendant City of Tacoma is responsible for formulating and implementing the  
 23 Tacoma Police Department's policies and procedures and ensuring its officers are properly  
 24 and adequately trained.

26           COMPLAINT FOR DAMAGES 2 of 9



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2.3 Defendant Kristopher Clark is or was at all relevant times a City of Tacoma police officer who, all times relevant hereto, was acting under color of law.

### III. JURISDICTION AND VENUE

3.1      Venue is proper in Pierce County under RCW 4.12.020.

3.2 Jurisdiction is proper under RCW 4.96.010 and 4.96.020. A City of Tacoma  
claim for damages form was presented to the City of Tacoma, City Clerk's Office as directed  
on the tort claim form. More than sixty (60) calendar days have elapsed since the filing of the  
tort claim form such that filing of this action is allowed pursuant to Pursuant to RCW  
4.96.020.

#### IV. JURY DEMAND

4.1 Plaintiff hereby demands a jury trial on the causes of action set forth herein.

## V. STATEMENT OF FACTS

5.1 On October 12, 2011, at or around 8:30 p.m., Plaintiff Than Orn was driving his family car, registered to his wife at his home address, in South Tacoma.

5.2 At or about that same time, upon information and belief, Tacoma Police Department (TPD) Patrol Sgt. Alan Morris began following Orn allegedly because Orn was driving without lights.

5.3 A short time later, Morris called over the police radio system to report that Orn allegedly would not stop the vehicle. Approximately five (5) minutes after he began following Orn, Morris told dispatch the vehicle was not driving recklessly, just that driver allegedly would not stop.

1           5.5   Upon information and belief, TPD police units were ordered to conduct a  
 2 Pursuit Immobilization Technique (PIT) maneuver on Than Orn's vehicle but failed to do so.

3           5.6   At approximately 8:43 p.m., all units were ordered to stay in vehicles.

4           5.7   At or about this same time, Than Orn continued on toward his apartment  
 5 complex located at 6634 Tacoma Mall Boulevard. Upon information and belief, Orn's speed  
 6 never exceeded 30 miles per hour.

7           5.8   At approximately 8:46 p.m., Orn pulled into his apartment complex with TPD  
 8 K-9 Officer David Johnson directly behind him. Officer Johnson later testified under oath  
 9 that Orn's vehicle speed was little more than a crawl. Upon information and belief, Officer  
 10 Johnson ordered all units again to stay in their vehicles.

11           5.9   At or about this same time, Defendant Kristopher Clark was positioned, along  
 12 with approximately twelve (12) additional police units, at or very near the parking lot of Than  
 13 Orn's apartment complex waiting for Orn to arrive.

14           5.10   As Plaintiff Orn pulled into his apartment complex at little more than a crawl,  
 15 Defendant Kristopher Clark exited his police vehicle, despite orders to stay in his vehicle, and  
 16 according to TPD Officer Robert DeNully, Clark began "running and shooting" at Plaintiff  
 17 Than Orn. Defendant Clark is the only TPD officer to draw and fire his weapon at Orn.

18           5.11   Defendant Clark shot ten (10) times. According to a ballistics investigation,  
 19 eight (8) of Clark's shots entered through the rear of Than Orn's vehicle as Orn's vehicle was  
 20 moving away from Defendant Clark. The other two (2) shots by Clark were fired through the  
 21 rear passenger window or the rear passenger wing window. These two other shots were again  
 22 fired while Orn's vehicle traveled away from Defendant Clark.

5.12 Plaintiff Than Orn was struck multiple times in the neck, right shoulder and back by Defendant Clark's gunshots. According to medical reports, Orn suffered complete spinal cord injury (SCI) at the first lumbar vertebra due to a bullet lodged in his spine. Plaintiff also suffered severe cervical spine trauma including fractures of the fourth, fifth and sixth cervical vertebrae transverse process, as well as a fracture to his right scapular. Plaintiff Orn is not expected to recover any function below the L1 level of his spine.

## VI. CAUSES OF ACTION

#### **A. Unconstitutional Use of Excessive Force by Defendant Kristopher Clark.**

6.1 Plaintiff re-alleges the paragraphs set forth above.

6.2 The Fourth Amendment to the United States Constitution prohibits unreasonable searches and seizures of the person. This protects citizens and members of the community and prohibits the government from using excessive force against those citizens. The shooting of a fleeing suspect constitutes a Fourth Amendment “seizure.” The Fourteenth Amendment of the U.S. Constitution applies the Fourth Amendment’s provisions against state and local actors.

6.3 At all material times, Officer Clark operated under color of law.

6.4 Officer Clark violated the Fourth Amendment's clearly established prohibitions against excessive force when he employed the use of deadly force against Than Orn for failing to yield or failing to obey instructions without any objectively reasonable belief that Orn posed an immediate threat of harm to himself or others. Than Orn was unarmed and was not suspected of a violent criminal offense. Moreover, Orn was driving out

1 of the path of police officers at an extremely slow speed but was nonetheless shot by a  
2 chasing Officer Clark in the back, back shoulder and the back of the neck.

3       6.5     As a direct and proximate result of these constitutional violations, Than Orn  
4 was shot and seriously and permanently injured, and continues to suffer, experiencing  
5 substantial physical, mental and emotional pain, anguish and anxiety.  
6

7       **B.     Violations of Constitutional Rights by Defendant City of Tacoma.**

8       6.6     Plaintiff re-alleges the paragraphs set forth above.

9       6.7     Defendant City of Tacoma Police Department violated Plaintiff's  
10 Constitutional rights under the Fourth and Fourteenth Amendments to the U.S. Constitution,  
11 as set forth herein, and in other respects as well.  
12

13       6.8     Defendant City of Tacoma and the Tacoma Police Department have customs,  
14 policies, and practices that amount to deliberate indifference to the rights of persons with  
15 whom its officers regularly come into contact, including nonviolent suspects like Than Orn.  
16

17       6.9     Defendant City of Tacoma and the Tacoma Police Department, with  
18 deliberate indifference, failed to train the Tacoma Police Department's law enforcement  
19 officers and failed to adopt and implement policies for, among other things, the use of de-  
20 escalation techniques, non-lethal tactics, proper nonviolent suspect apprehension techniques,  
21 and the decision-making process that should accompany use of deadly force.  
22

23       6.10    The failure by Defendant City of Tacoma and the Tacoma Police Department  
24 to adequately and appropriately train its officers and employees amounts to deliberate  
25 indifference to the rights of the persons with whom the Tacoma Police Department's  
26 employees regularly come into contact, including nonviolent suspects like Than Orn.

1       6.11 It was highly predictable that Defendant's failures would result in  
2 constitutional violations, like those that occurred in this case. Plaintiff's permanently  
3 debilitating injuries are the foreseeable consequence of the Tacoma Police Department's  
4 failure to equip its law enforcement officers with the necessary training and tools to handle  
5 recurring situations, such as those involving a nonviolent suspect failing to yield or failing to  
6 obey an officer's instructions.  
7

8       6.12 The actions of the officers involved, which deprived the Plaintiff of his  
9 Constitutional rights, conformed to official policy, custom, and practice of Defendant City of  
10 Tacoma. Defendant City of Tacoma and the Tacoma Police Department's policy of shooting  
11 an unarmed individual failing to yield, but avoiding officers and driving at an extremely low  
12 speed is blatantly unconstitutional and jeopardizes the safety of all citizens, as evidenced by  
13 the police shooting of Than Orn. Moreover, Defendant City of Tacoma has ratified the  
14 conduct of Defendant Clark in relation to the injuries of Than Orn, by refusing to  
15 appropriately sanction Defendant Clark for his actions.  
16

17       6.13 As a result of the actions and deliberate indifference of Defendant City of  
18 Tacoma and the Tacoma Police Department, Than Orn was shot multiple times in the back,  
19 back shoulder and neck, including the spine. Plaintiff Orn is permanently injured and  
20 continues to suffer, experiencing substantial physical, mental and emotional pain, anguish and  
21 anxiety.  
22

23       **C. Negligent and Grossly Negligent Hiring, Training and Supervision of  
24 Employees and Agents.**

25       6.14 Plaintiff re-alleges the paragraphs set forth above.  
26

1       6.15 Defendants have a duty to use reasonable care in hiring, training and  
2 supervising employees and agents.

3       6.16 Defendants breached this duty in a negligent and grossly negligent manner. As  
4 a proximate result of Defendants' breach, Than Orn is permanently injured and continues to  
5 suffer, experiencing substantial physical, mental and emotional pain, anguish and anxiety.  
6

7           **F.     Respondeat Superior**

8       6.17 Plaintiff re-alleges the paragraphs set forth above.

9       6.18 At all times material herein, Defendants were responsible for the actions of  
10 their agents and employees under the theory of *respondeat superior*.

11           **VII.    PRAYER FOR RELIEF**

12       WHEREFORE, Plaintiff requests a judgment for Plaintiff and against Defendants  
13 Kristopher Clark and the City of Tacoma as follows:

14       1)     Awarding general, special and punitive damages, including damages for pain  
15 and suffering, pursuant to 42 U.S.C. §§ 1983 and 1988, in an amount to be proven at trial;

16       2)     Awarding costs and reasonable attorneys' fees pursuant to 42 U.S.C. § 1988,  
17 or as otherwise available under the law;

18       3)     General and special damages as allowed by Washington law, including but not  
19 limited to economic and non-economic injuries in an amount to be proven at trial;

20       4)     Awarding any and all applicable interest on the judgment; and

21       5)     Awarding such other and further relief as the Court deems just and proper.

22       //

23       //

24       COMPLAINT FOR DAMAGES 8 of 9



25       911 Pacific Avenue, Suite 200  
26       Tacoma, WA 98402  
Phone: (253) 777-0799 Facsimile: (253) 627-0654

1 DATED this 9th day of October, 2013.  
2  
3

4 PFAU COCHRAN VERTETIS AMALA, PLLC  
5

6 By   
7 Darrell L. Cochran, WSBA No. 22851  
8 Loren A. Cochran, WSBA No. 32773  
9 Attorneys for Plaintiff

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LAW OFFICE OF THOMAS A. BALERUD

By: /s/ Thomas A. Balerud

Thomas A. Balerud, WSBA No. 19539  
Attorney for Plaintiff

4824-8909-5190, v. 1

COMPLAINT FOR DAMAGES 9 of 9

 PFAU COCHRAN  
VERTETIS AMALA  
A Professional Limited Liability Company

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Tacoma, WA 98402  
Phone: (253) 777-0799 Facsimile: (253) 627-0654

October 10 2013 10:57 AM

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COUNTY CLERK  
NO: 13-2-13886-2

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OCT 16 2013

TACOMA CITY ATTORNEY  
CIVIL DIVISION

THAN ORN

Plaintiff(s)

Vs.

CITY OF TACOMA

Defendant(s)

No. 13-2-13886-2

## ORDER SETTING CASE SCHEDULE

Type of case: PIN

Estimated Trial (days):

Track Assignment: Standard

Assignment Department: 06

Docket Code: ORSCS

Confirmation of Service	11/7/2013
Confirmation of Joinder of Parties, Claims and Defenses	2/6/2014
Jury Demand	2/13/2014
Status Conference (Contact Court for Specific Date)	Week of 3/6/2014
Plaintiff's/Petitioner's Disclosure of Primary Witnesses	4/3/2014
Defendant's/Respondent's Disclosure of Primary Witnesses	5/1/2014
Disclosure of Rebuttal Witnesses	6/19/2014
Deadline for Filing Motion to Adjust Trial Date	7/17/2014
Discovery Cutoff	8/21/2014
Exchange of Witness and Exhibit Lists and Documentary Exhibits	9/4/2014
Deadline to file Certificate or Declaration re: Alternative Dispute Resolution (PCLR 16 (c)(3))	9/11/2014
Deadline for Hearing Dispositive Pretrial Motions	9/11/2014
Joint Statement of Evidence	9/11/2014
Pretrial Conference (Contact Court for Specific Date)	Week of 9/25/2014
Trial	10/9/2014 9:00

**Unless otherwise instructed, ALL Attorneys/Parties shall report to the trial court at 9:00 AM on the date of trial.**

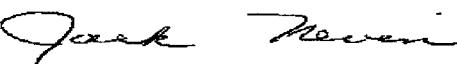
**NOTICE TO PLAINTIFF/PETITIONER**

If the case has been filed, the plaintiff shall serve a copy of the Case Schedule on the defendant(s) with the summons and complaint/petition: Provided that in those cases where service is by publication the plaintiff shall serve the Case Schedule within five (5) court days of service of the defendant's first response/appearance. If the case has not been filed, but an initial pleading is served, the Case Schedule shall be served within five (5) court days of filing. See PCLR 3.

**NOTICE TO ALL PARTIES**

All attorneys and parties shall make themselves familiar with the Pierce County Local Rules, particularly those relating to case scheduling. Compliance with the scheduling rules is mandatory and failure to comply shall result in sanctions appropriate to the violation. If a statement of arbitrability is filed, PCLR 3 does not apply while the case is in arbitration.

Dated: October 10, 2013


  
\_\_\_\_\_  
Judge JACK NEVIN  
Department 06

**RECEIVED**

OCT 16 2013

TACOMA CITY ATTORNEY  
CIVIL DIVISION

VIA Delivery  
Dkt to Service a complaint  
by Court Clerk for  
Court of the City only

E-FILED  
IN COUNTY CLERK'S OFFICE  
PIERCE COUNTY, WASHINGTON

October 10 2013 10:57 AM

KEVIN STOCK  
COUNTY CLERK  
NO: 13-2-13886-2

**SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY****CASE COVER SHEET / CIVIL CASES**

THAN ORN VS. CITY OF TACOMA

Case Title \_\_\_\_\_

Case Number 13-2-13886-2

Atty/Litigant DARRELL L. COCHRAN

Bar # 22851 Phone (253) 777-0799

Address 911 Pacific Ave Ste 200

City TACOMA

State WA Zip 98402

Please check one category that best describes this case for indexing purposes.

*If you cannot determine the appropriate category, please describe the cause of action below. This will create a Miscellaneous cause which is not subject to PCLR 3.*

**APPEAL / REVIEW**

- Administrative Law Review (ALR 2) *REV 6*
- Civil, Non-Traffic (LCA 2) *REV 6*
- Civil, Traffic (LCI 2) *REV 6*
- Land Use Petition (LUP 2) *LUPA*

**CONTRACT / COMMERCIAL**

- Breach of Contract, Commercial Non-Contract or Commercial-Contract (COM 2) *STANDARD*
- Third Party Collection (COL 2) *REV 4*

**JUDGMENT**

- Judgment, Another County or Abstract Only (ABJ 2) *Non PCLR*
- Transcript of Judgment (TRJ 2) *Non PCLR*
- Foreign Judgment Civil or Judgement, Another State (FJU 2) *Non PCLR*

**TORT / MOTOR VEHICLE**

- Death, Non-Death Injuries or Property Damage Only (TMV 2) *STANDARD*

**TORT / NON MOTOR VEHICLE**

- Other Malpractice (MAL 2) *COMPLEX*
- Personal Injury (PIN 2) *STANDARD*
- Property Damage (PRP 2) *STANDARD*
- Wrongful Death (WDE 2) *STANDARD*
- Other Tort,Products Liability or Asbestos (TTO 2) *COMPLEX*

**MISCELLANEOUS****PROPERTY RIGHTS**

- Condemnation (CON 2) *STANDARD*
- Foreclosure (FOR 2) *REV 4*
- Property Fairness (PFA 2) *STANDARD*
- Quiet Title (QTI 2) *STANDARD*
- Unlawful Detainer / Eviction (UND 2) *REV 4*
- Unlawful Detainer / Contested (UND 2) *REV 4*

**OTHER COMPLAINT OR PETITION**

- Compel/Confirm Bind Arbitration, Deposit of Surplus Funds, Interpleader, Subpoenas, Victims' Employment Leave, or Wireless Number Disclosure, Miscellaneous (MSC 2) *REV 4*
- Injunction (INJ 2) *REV 4*
- Malicious Harassment (MHA 2) *Non PCLR*
- Meretricious Relationship (MER 2) *REV 4*
- Minor Settlement/No Guardianship(MST2) *REV 4*
- Pet for Civil Commit/Sex Predator (PCC2) *REV 4*
- Property Damage Gangs (PRG 2) *REV 4*
- Seizure of Property/Comm. of Crime(SPC2) *REV 4*
- Seizure of Property Reslt from Crime(SPR2) *REV 4*

**TORT / MEDICAL MALPRACTICE**

- Hospital, Medical Doctor, or Other Health Care Professional (MED2) *COMPLEX*

**WRIT**

- Habeas Corpus (WHC 2) *REV 4*
- Mandamus (WRM 2) *REV 4*
- Review (WRV 2) *REV 4*
- Miscellaneous Writ (WMW 2) *REV 4*